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*Co-Counsel for Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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In re:	)	Chapter 11
	)	
GEMSTONE SOLUTIONS GROUP, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 19-30258 (KLP)
	)	
Debtors.	)	(Jointly Administered)
	)	

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**PROPOSED AGENDA FOR MATTERS SCHEDULED  
FOR NOVEMBER 14, 2019, AT 10:00 A.M. (PREVAILING EASTERN TIME)**

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**I. DEBTOR MOTIONS**

1. **“Replacement LC Motion.”** *Debtors’ Application for Entry of Interim and Final Orders (I) Authorizing them to Replace an Existing Letter of Credit and (II) Granting a Waiver of (A) the Requirements of Section 345(b) of the Bankruptcy Code and (B) Certain of the U.S. Trustee’s Operating Guidelines* [Docket No. 1100]

**Responses Received:**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Gemstone Solutions Group, Inc. f/k/a Gymboree Group, Inc. (6587); Gemstone Solutions Intermediate Corporation f/k/a Gymboree Intermediate Corporation (1473); Gemstone Solutions Holding Corporation f/k/a Gymboree Holding Corporation (0315); Gemstone Solutions Wholesale, Inc. f/k/a Gymboree Wholesale, Inc. (6588); Gemstone Solutions Mark, Inc. f/k/a Gym-Mark, Inc. (6459); Gemstone Solutions Operations, Inc. f/k/a Gymboree Operations, Inc. (6463); Gemstone Solutions Distribution, Inc. f/k/a Gymboree Distribution, Inc. (8669); Gemstone Solutions Manufacturing, Inc. f/k/a Gymboree Manufacturing, Inc. (6464); Gemstone Solutions RS, LLC f/k/a Gymboree Retail Stores, LLC (6461); Gemstone Solutions Card, LLC f/k/a Gym-Card, LLC (5720); and Gemstone Solutions PR, LLC f/k/a Gymboree Island, LLC (1215). The Debtors’ service address is P.O. Box 192976, San Francisco, California 94119.

- A. *Objection of United States Trustee of Debtors' Application for Entry of Interim and Final Orders (I) Authorizing them to Replace an Existing Letter of Credit and (II) Granting a Waiver of (A) the Requirements of Section 345(b) of the Bankruptcy Code and (B) Certain of the U.S. Trustee's Operating Guidelines* [Docket No. 1117]

Related Documents:

- A. *Notice of Application and Notice of Hearing* [Docket No. 1101]
- B. *Notice of Revised Final Proposed Order (I) Authorizing them to Replace an Existing Letter of Credit and (II) Granting a Waiver of (A) the Requirements of Section 345(b) of the Bankruptcy Code and (B) Certain of the U.S. Trustee's Operating Guidelines* [Docket No. 1124]
- C. *Interim Order (I) Authorizing them to Replace an Existing Letter of Credit and (II) Granting a Waiver of (A) the Requirements of Section 345(b) of the Bankruptcy Code and (B) Certain of the U.S. Trustee's Operating Guidelines* [Docket No. 1137]

Status: This matter is going forward on a final basis.

2. **"Eighth Motion to Authorize Contract Rejection."** *Debtors' Eighth Motion for Entry of an Order Authorizing Them to Reject Certain Executory Contracts* [Docket No. 1156]

Responses Received: None

Related Documents:

- A. *Notice of Motion and Notice of Hearing* [Docket No. 1157]

Status: This matter is going forward on an uncontested basis.

**II. NON-DEBTOR MOTIONS**

1. **"Pan Pacific Motion."** *Notice of and Motion, in accordance with Agreed Order, to Determine that Pan Pacific's D&O Claims are not Estate Property; and Notice of Hearing Thereon* [Docket No. 1013]

Responses Received: None

Related Documents:

A. *Stipulation and Agreed Order by and among Debtors and Pan Pacific Co. Ltd. in Connection with Debtors' Emergency Motion for Interim and Final Orders (I) Enforcing the Automatic Stay, (II) Directing Parties to Comply with Prior Plan, and (III) Granting Related Relief* [Docket No. 934]

Status: The parties have agreed to adjourn this matter until the hearing on December 16, 2019.

### **III. ADVERSARY PROCEEDING**

1. “**Deutsche Bank Adversary**.” *Deutsche Bank Trust Company Americas v. Gymboree Group, Inc., et. al.*, Case No. 19-03071 (KLP) [Docket No. 1]

Responses Received:

A. *Defendants' Motion to Dismiss Complaint Pursuant to FRCP 12(B)(6) and Memorandum in Support* [Docket No. 10]

Related Documents:

A. *Summons and Notice in an Adversary Proceeding* [Docket No. 3]

B. *Defendants' Unopposed Motion for Enlargement of Time to Respond to Complaint* [Docket No. 5]

C. *Order Granting Enlargement of Time for Defendants to Respond to Complaint* [Docket No. 7]

D. *Notice of Motion and Notice of Hearing* [Docket No. 11]

E. *Amended Notice of Hearing* [Docket No. 17]

F. *Opposition of Deutsche Bank Trust Company Americas to Defendants Motion to Dismiss Pursuant to Rule 12(b)(6)* [Docket No. 18]

G. *Amended Opposition of Deutsche Bank Trust Company Americas to Defendants Motion to Dismiss Pursuant to Rule 12(b)(6)* [Docket No. 20]

Status: This matter is going forward.

Dated: November 12, 2019  
Richmond, Virginia

/s/ Brian H. Richardson  
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